MICHAEL MIRONICK, of full age, being duly sworn according to law, upon his oath deposes and says:

- 1. I reside at 419 Newark Avenue, Piscataway, New Jersey.
- 2. I have been employed at the National Gypsum Company Asbestos Plant in Millington (Passaic Township) Morris County, New Jersey from January 1961 to date.
- 3. I have never witnessed the adding of waste material to the mounds on the property adjacent to the Passaic River.

  The mounds have grown over with trees, grass and other ground cover.
- 4. The creation of the mounds occured prior to my joining the company in 1961 and, on information and belief, it occured prior to 1953.

MICHAEL MIRONICK

Subscribed and sworn to before November me this 16th day of November,

1977.

Rose G. Lynn, Notary Public of New Jersey, Commission Expires: June 24, 1980 ASB 002 025